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December 10, 2014

**BY ECF**

The Honorable Katherine B. Forrest  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Ross Ulbricht*  
14 Cr. 68 (KBF)

Dear Judge Forrest:

This letter is submitted on behalf of defendant Ross Ulbricht, respectfully requesting that the Court ask jurors during oral *voir dire* the following questions, initially submitted to the Court as part of our proposed juror questionnaire (Docket # 53), but which the Court did not include in the final juror questionnaire (Docket # 105):

- This case involves allegations, but it is not among the formal charges in this case, that the defendant engaged in “murder for hire.” He has denied those allegations. Every defendant is presumed innocent. Do you believe that you would be able to be fair and impartial in a case involving such allegations? (Docket #53, Question #29);
- This case involves charges that the defendant, among other charges, violated the narcotics laws of the United States. He has denied those allegations. Every defendant is presumed innocent. Do you believe that you would be able to be fair and impartial in a case involving such charges? (Docket #53, Question #30);
- Have you heard anything about this case, the charges, or the defendant in this case from any of the following sources: television; radio; a newspaper; the Internet/

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online; news magazines; conversations with family members; conversations with co-workers, friends or neighbors; or overheard conversations in the community? (Docket #53, Question #31). If a potential juror answers “yes,” a follow-up question should address what they have heard or read;

- Have you ever sold anything on the internet? If a potential juror answers “yes,” follow-up questions should address (1) the nature of the items sold; (2) the website(s) the juror used; (3) the frequency and volume of the sales; and (4) whether the sales made were part of a business (Docket #53, Question #40); and
- Have you ever traveled outside the United States? If a potential juror answers “yes,” follow-up questions should address (1) where the potential juror has traveled; and (2) the purpose of the trip(s) (Docket #53, Question #44).

In the event, however, that the Court grants Mr. Ulbricht’s motion *in limine* precluding any mention of the “murder for hire” allegations at trial, Mr. Ulbricht withdraws his request that question #29 of his proposed juror questionnaire should be asked as part of oral *voir dire*.

Respectfully submitted,



Lindsay A. Lewis

LAL/

cc: Serrin Turner  
Timothy T. Howard  
Assistant United States Attorneys